

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

INSPIRED PURSUITS, LLC,
QUALTIM, INC., CENTER FOR
BUILDING INNOVATION, LLC,
DRJ ENGINEERING, LLC, KIRK
GRUNDAHL, and SUZANNE
GRUNDAHL,

Case No. 3:25-cv-00075-wmc

Plaintiffs,

V.

PARAGON COMPONENT SYSTEMS, LLC,
JOHN HOLLAND, JAMES HOLLAND,
CLEARSPAN COMPONENTS, LLC,
ANDREW EWIN, DAVID REED, SCOTT
HOELSMA, SETH DUNCAN, MICHAEL
PITTS, AVERY RADMACHER, NATHAN
BIERMEMA, JEREMY BIEREMA, ROB
EASON, and THE ESTATE OF DANIEL
HOLLAND EX REL. SPECIAL
EXECUTOR MARVIN B. SPEED,

Defendants.

**DEFENDANT'S [PROPOSED] SUR-REPLY
IN OPPOSITION TO MOTION TO REMAND**

In their reply in support of the motion for remand, Plaintiffs argue, for the first time, that “Defendants focus on the [Paragon] Software to force this to be a copyright case, but ownership of the Software is irrelevant here” (Doc. 38 at 3) and “the copyright issues of the software . . . are already being addressed in the Declaratory Judgment action, *Paragon et al v. Inspired Pursuits, et al*, Case No. 25-CV-00170” (*id.* at 2). Yet, in the parallel Case No. 3:25-cv-170 before this Court, Plaintiffs moved to

stay that action because, they admitted, the present case “initially filed in state court and pending a remand *addresses the ownership and possessory interest at issue . . .*” Case No. 25-CV-00170, Doc. 95-1 at 12. In other words, Plaintiffs are taking contrary positions in both cases, as each of these co-pending cases will require this Court to resolve the software ownership issue which Plaintiffs now argue stems from an inchoate and undefined business “Model.”

Respectfully submitted this ____ day of April 2025.

GASS TUREK LLC

Counsel for Defendants Paragon Component Systems, LLC and John Holland

s/ Tamar B. Kelber

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